

SDNY (Rev. 10/2006) Pro Hac Vice Motion to Admit Counsel

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CARMELO MILLAN, Individually and
on Behalf of All other persons similarly
situated,

Plaintiff,

Civil Action No. 07 CV 3769

- against -

MOTION TO ADMIT COUNSEL

CITIGROUP, INC.

PRO HAC VICE

Defendant.

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Samuel S. Shaulson, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of

Applicant's Name:	Kelly Basinger Charnley
Firm Name:	Morgan, Lewis & Bockius LLP
Address:	1701 Market Street
City/State/Zip:	Philadelphia, PA 19103-2921
Phone Number:	(215) 963-5763
Fax Number:	(215) 963-5001

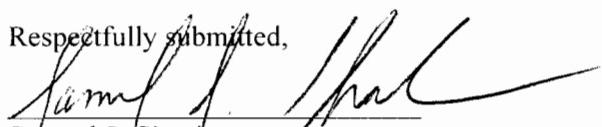
Kelly Basinger Charnley is a member in good standing of the Bars of the States of Pennsylvania and New Jersey and of the Eastern District of Pennsylvania.

There are no pending disciplinary proceedings against Kelly Basinger Charnley in any State or Federal court.

Dated: June 22, 2007

City, State: New York, New York

Respectfully submitted,


Samuel S. Shaulson
SDNY Bar SS-0460
Morgan, Lewis & Bockius LLP
101 Park Avenue
New York, NY 10178
Phone Number: (212) 309-6718
Fax Number: (212) 309-6001

SDNY (Rev. 10/2006) Affidavit in Support of Motion to Admit Counsel Pro Hac Vice

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

CARMELO MILLAN, Individually and on
Behalf of All other persons similarly situated,

Civil Action No. 07 CV 3769

Plaintiff,

- against -

CITIGROUP, INC.

Defendant.

**AFFIDAVIT OF
SAMUEL S. SHAULSON
IN SUPPORT OF MOTION
TO ADMIT COUNSEL
PRO HAC VICE**

State of New York)
)
 ss:
County of New York)

Samuel S. Shaulson, being duly sworn, hereby deposes and says as follows:

1. I am a Partner at Morgan, Lewis & Bockius and counsel for Defendant in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Defendant's motion to admit Kelly Basinger Charnley as counsel pro hac vice to represent Defendant in this matter.
2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law on March 14, 1994. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
3. I have known Kelly Basinger Charnley since July 17, 2006.
4. Ms. Charnley is an Associate at Morgan, Lewis & Bockius in Philadelphia, Pennsylvania.
5. I have found Ms. Charnley to be a skilled attorney and a person of integrity. She is experienced in Federal practice and is familiar with the Federal Rules of Procedure.
6. Accordingly, I am pleased to move the admission of Kelly Basinger Charnley, pro hac vice.
7. I respectfully submit a proposed order granting the admission of Kelly Basinger Charnley, pro hac vice, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit Kelly Basinger Charnley, pro hac vice, to represent Defendant in the above captioned matter, be granted.

Dated: June 22, 2007

City, State: New York, New York

Notarized: Lorraine Landau

LORRAINE LANDAU
Notary Public, State of New York
No. 604879478
Qualified in Westchester County
Certified in New York County
Commission Expires December 1, 2010

Respectfully submitted,

Samuel S. Shaulson
Samuel S. Shaulson
SDNY Bar SS-0460

CERTIFICATE OF GOOD STANDING

UNITED STATES OF AMERICA

EASTERN DISTRICT OF PENNSYLVANIA }

I, Michael E. Kunz, Clerk of the United States District Court for the Eastern District of Pennsylvania,

DO HEREBY CERTIFY That Kelly Basinger Charnley , Bar # 200278, was duly admitted to practice in said Court on April 20, 2006, and is in good standing as a member of the bar of said Court.

DATED at Philadelphia, Pennsylvania

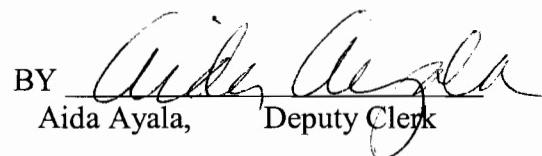
MICHAEL E. KUNZ

Clerk of Court

on June 5, 2007.

BY

Aida Ayala, Deputy Clerk



Supreme Court of New Jersey

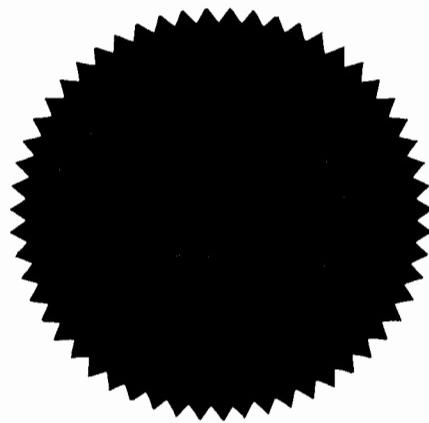


Certificate of Good Standing

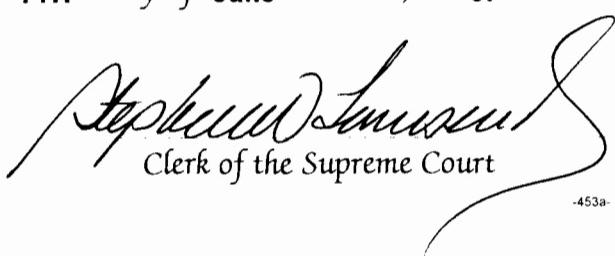
This is to certify that **KELLY BASINGER CHARNLEY**
(No. **013682005**) was constituted and appointed an Attorney at Law of New Jersey on **December 13, 2005** and, as such, has been admitted to practice before the Supreme Court and all other courts of this State as an Attorney at Law, according to its laws, rules, and customs.

I further certify that as of this date, the above-named is an Attorney at Law in Good Standing. For the purpose of this Certificate, an attorney is in "Good Standing" if the Court's records reflect that the attorney: 1) is current with all assessments imposed as a part of the filing of the annual Attorney Registration Statement, including, but not limited to, all obligations to the New Jersey Lawyers' Fund for Client Protection; 2) is not suspended or disbarred from the practice of law; 3) has not resigned from the Bar of this State; and 4) has not been transferred to Disability Inactive status pursuant to Rule 1:20-12.

Please note that this Certificate does not constitute confirmation of an attorney's satisfaction of the administrative requirements of Rule 1:21-1(a) for eligibility to practice law in this State.



In testimony whereof, I have hereunto set my hand and affixed the Seal of the Supreme Court, at Trenton, this
7TH day of June , 20 07


Stephen J. Cammilleri
Clerk of the Supreme Court

SDNY (Rev. 10/2006) Order for Admission Pro Hac Vice on Written Motion

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

CARMELO MILLAN, Individually and
on Behalf of All other persons similarly
situated,

Plaintiff,

Civil Action No. 07 CV 3769

- against -

CITIGROUP, INC.

**ORDER FOR ADMISSION
PRO HAC VICE
ON WRITTEN MOTION**

Defendant.

Upon the motion of Samuel S. Shaulson, attorney for Citigroup, Inc. and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Applicant's Name: Kelly Basinger Charnley
Firm Name: Morgan, Lewis & Bockius LLP
Address: 1701 Market Street
City/State/Zip: Philadelphia, PA 19103-2921
Telephone/Fax: Telephone (215) 963-5763
Fax (215) 963-5001
Email Address: kcharnley@morganlewis.com

is admitted to practice pro hac vice as counsel for Citigroup, Inc in the above captioned case in the United States District for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated: June ___, 2007

City, State: New York, New York

United States District/Magistrate Judge

CERTIFICATE OF SERVICE

I, Samuel S. Shaulson, hereby certify that on June 23, 2007, I served a true and correct copy of the foregoing Motion upon the following via U.S. Mail:

Fran L. Rudich, Esquire
Seth R. Lesser, Esquire
LOCKS LAW FIRM
110 East 55th Street, 12th Floor
New York, New York 10022
(212) 838-3333

Jeffrey M. Gottlieb, Esquire
BERGER & GOTTLIEB
150 East 18th Street, Suite PHR
New York, New York 10003
(212) 228-9795

Attorneys for Plaintiff



Samuel S. Shaulson

A handwritten signature in black ink, appearing to read "Samuel S. Shaulson". The signature is fluid and cursive, with a large, sweeping flourish at the end.